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REMARKS

Claims 1-2, 4-6, 9 and 11 are pending.

Claim 12 is cancelled and is incorporated in Claim 9.

Claims 10, 12, 13 and 14 are cancelled.

ARGUMENTS

I. 35 U.S.C. § 103 Rejection of Claims 9 and 11

The Examiner rejected Claim 9 (as former dependent Claim 12) under 35 U.S.C. § 103(a) as being unpatentable over Bortolussi et al. (U.S. Patent # 6,292,595, hereafter referred to as 'Bortolussi'), and in further view of Bonneau et al. (U.S. Patent # 6,002,794, hereafter referred to as 'Bonneau'). Applicants disagree with this ground of rejection.

Claim 9 claims a step of "obtaining various mirror versions of the normalized query bitmap". This claimed feature is neither disclosed nor suggested in Bortolussi or Bonneau, alone or in combination.

The Examiner in the rejection states that although Bortolussi does not disclose or suggest such a claimed feature, that Bonneau discloses, "that obtaining various mirrored images versions of an image are beneficial in that it creates more images for comparing another image with." The suggestion that the Examiner states has nothing to do with "obtaining various mirror versions of the normalized query bitmap" as the generated mirror images are used in conjunction as a normalized query bitmap during a process of "generating a normalized bitmap representation of the shape of a visual object in an image".

Specifically, the Bonneau reference is concerned compression schemes, specifically fractal encoding. When performing the compression algorithm, an image is divided into two sets of blocks called a domain block and range blocks. The mirror images are formed from the domain blocks and are compared against the range blocks. (Bonneau, col. 3, lines 4-16). These blocks are actually from

the same image (as an intra-encoding operation), and are not used as a comparison against "similarly shaped visual objects from a database", as claimed in Claim 9 (the query image is being compared against images in a database).
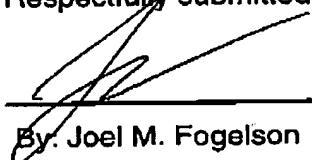
The disclosure from the Bonneau reference is that such mirror images of the domain blocks expedite the mapping of domain blocks to range blocks during a fractal encoding process. There is no disclosure or suggestion in Bortolussi that would indicate the use of such a fractal encoding operation from Bonneau with a operation for finding "similarly shaped visual objects" with a normalized query images as to motivate one skilled in the art to combine Bortolussi with Bonneau, in the manner suggested by the Examiner.

For the forgoing reasons listed above, Applicants assert that Claim 9 is patentable. Applicants request that the Examiner remove the rejection to this claim. Applicants also request that the Examiner remove the rejection to Claim 11, as the claim depends on allowable Claim 9.

Applicants believe that no fees are owed in connection with this paper. If any fees are owed for this action, please charge Deposit Account 07-0832.

It is believed that, in view of the preceding amendments and remarks, this application is in condition for allowance. Accordingly, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the Applicants' attorney at (609) 734-6809, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Respectfully submitted,

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Patent Operations

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